

BEFORE THE
SURFACE TRANSPORTATION BOARD

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URCS DATA REPORTING

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EP 769

COMMENTS OF THE WESTERN COAL TRAFFIC LEAGUE

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Dated: June 13, 2022

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Pursuant to the notice of proposed rulemaking that the Surface Transportation Board (“STB” or “Board”) served in the above-captioned proceeding on April 29, 2022 (“Notice”), the Western Coal Traffic League (“WCTL”)¹ submits the following comments regarding the proposal to require reporting of tare weight and loss and damage data for use in the Uniform Railroad Costing system (“URCS”).

First, the League supports the Board’s proposal. Tare weight and loss and damage are important inputs and features of URCS should not be left to voluntary reporting. Reporting of the data should be compulsory, as the Notice proposes.

Second, loss and damage data should be provided for the domestic affiliates of the Canadian carriers. Their information should not be excluded from the analysis.

Third, the League supports allowing the carriers to report their data directly, rather than having it compiled by the AAR for submission. Individual railroads should not be precluded from reporting their information directly.

¹ WCTL is a voluntary association, whose regular membership consists entirely of shippers of coal mined west of the Mississippi River that is transported by rail. WCTL members currently ship and receive in excess of 90 million tons of coal by rail each year. WCTL’s members are: Ameren Missouri, Arizona Electric Power Cooperative, Inc., Austin Energy (City of Austin, Texas), CLECO Corporation, CPS Energy, Entergy Services, Inc., Evergy, Inc., Lower Colorado River Authority, MidAmerican Energy Company, Minnesota Power, Nebraska Public Power District, and Western Fuels Association, Inc.

Fourth, the League respectfully submits that it would be superior to require reporting by individual carrier, rather than allowing reporting in the aggregate. The data and values might well vary from carrier to carrier, and allowing the use of aggregate data is likely to undermine accuracy. If one carrier has lower tare weights for a particular AAR car type, the use of aggregate data will suppress that carrier's efficiencies. Similarly, if one carrier experiences major loss and damage, use of aggregate data will cause those costs to be socialized, even though the loss and damage might be attributable to, for example, one carrier's unsound adoption of Precision Scheduled Railroading principles. Each Class I carrier is sufficiently large that its data should be accurate and reliable. To the extent individual reporting might result in statistical noise rather than improved the accuracy, or mirror the aggregate average, those possibilities should be assessed on the basis of actual data, rather than a conclusive presumption as appears to the case now.

Accordingly, the League supports the Board's proposal, but recommends that the Board go further and mandate submission of data at the individual carrier level.

Respectfully submitted,

WESTERN COAL TRAFFIC LEAGUE

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